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**MONTANA THIRTEENTH JUDICIAL DISTRICT COURT  
 YELLOWSTONE COUNTY**

STATE OF MONTANA,

Plaintiff,

v.

JESSICA LEIGH SIEGEL,  
 aka Jessica Hubley  
 aka Jessica Walker

Defendant.

Case No.

**STATE'S MOTION FOR LEAVE  
 TO FILE INFORMATION AND  
 AFFIDAVIT IN SUPPORT**

STATE OF MONTANA            )  
   : ss.  
 County of Lewis and Clark    )

Chris McConnell, Special Deputy County Attorney for Yellowstone County and Legal Counsel for the Office of the Montana State Auditor, Commissioner of Securities & Insurance, moves the Court for leave to file an Information and, after first being duly sworn upon oath, state as follows:

The information herein set out is a statement of facts relayed to Affiant by investigator(s) of the Office of the Montana State Auditor, Commissioner of Securities & Insurance, and other witnesses, that Affiant has reviewed such facts, and upon these facts as relayed to him bases the foregoing Motion

for Leave to File Information against the above-named Defendant, and that the matters, facts, and things herein related are true to the best of the Affiant's knowledge, information, and belief. The facts alleged in this Motion for Leave and Affidavit in Support demonstrate probable cause to believe that the above-named Defendant has committed the offenses of:

- Count 1: **CRIMINAL INSURANCE FRAUD**, a felony, common scheme, in violation of Mont. Code Ann. §§ 33-1-1504(1)(b) and 45-2-101(8) (2017-2019);
- Count 2: **CRIMINAL INSURANCE FRAUD**, a felony, common scheme, in violation of Mont. Code Ann. §§ 33-1-1504(1)(b) and 45-2-101(8) (2017-2019);
- Count 3: **CRIMINAL INSURANCE FRAUD**, a felony, common scheme, in violation of Mont. Code Ann. §§ 33-1-1504(1)(b) and 45-2-101(8) (2019);
- Count 4: **CRIMINAL INSURANCE FRAUD**, a felony, common scheme, in violation of Mont. Code Ann. §§ 33-1-1504(1)(b) and 45-2-101(8) (2017-2019); and
- Count 5: **CRIMINAL INSURANCE FRAUD**, a felony, common scheme, in violation of Mont. Code Ann. §§ 33-1-1504(1)(b) and 45-2-101(8) (2019).

The State provides the following facts for purposes of establishing probable cause. Additional facts are contained in the State's discovery.

### **BACKGROUND**

On or about August 12, 2020, the Office of the Montana State Auditor, Commissioner of Securities & Insurance (CSI), received a fraud referral related to the Defendant, Jessica Leigh Siegel. The Defendant was a Montana licensed insurance producer. The Defendant was licensed in the lines of life and disability insurance. The Defendant became appointed with Colonial Life and Accident Insurance Company (Colonial) as an independent sales contractor on or about October 8, 2018.

The fraud referral alleged that the Defendant, while acting in a capacity of an independent sales contractor/insurance producer for Colonial,

submitted several policy applications for individuals using false information, including, for example, false names, false employment information, false social security numbers, false dates of birth, and false addresses. The Defendant falsified all this information to enroll several Montana businesses' "employees" with insurance coverage, sold insurance products for group policies, and received money paid to her by Colonial.<sup>1</sup> Colonial relied upon the materially false or altered information on the electronic policy applications and forms to pay the Defendant. The documents in this case involved insurance policies and products for various employers and their "employees" in Montana.

In sum, from on or about February 1, 2019, to May 29, 2020, the Defendant presented or caused to be presented to Colonial approximately 164 materially false or altered applications of insurance for approximately 58 "employees" and three of their spouses under five different employer group accounts. Based on the Defendant's conduct and series of acts, Colonial paid the Defendant approximately \$115,009.12 in commissions or other monies.

Lee Thomas, who was a Lead Investigative Consultant (LIC) at Colonial, submitted the fraud referral to CSI. With each account and application, the identified employer was required to withhold premium for the individual "employee's" coverage, which premium would then be sent to Colonial. However, Colonial did not receive the policy premiums. Colonial eventually terminated the Defendant's employment with their company.

CSI Investigator Neil Brunett investigated the referral. CSI Brunett also spoke with witnesses. Like LIC Thomas, CSI Brunett discovered that the Defendant created false identities and fictitious personal identifying

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<sup>1</sup> Colonial is a subsidiary of Unum Group, both of which are insurers as defined in Mont. Code Ann. § 33-1-201

information (PII) in the insurance policy applications, presented the applications to Colonial, and obtained money from Colonial based on the materially false or altered applications.

The Defendant submitted several electronic applications on insurance products and/or policies with no premiums going to Colonial. For example, those insurance policies and products included life insurance, long term care insurance, hospital confinement insurance, accident insurance, and critical illness insurance. The Defendant also applied for Colonial insurance policies and products for three of the fictitious employees' spouses. *See infra*.

The Defendant would submit account information forms to Colonial for businesses in Montana. The account information form is the form submitted by the contract agent to Colonial's home office. The form is used to set up the group policy accounts for the purposes of billing and application submission. This form contains information about the group account, including addresses, names of the authorizing officer, business types and contact information.

The Defendant used both the names Jessica Siegel and Jessica Hubley for activities with Colonial. According to the Defendant's license information, the Defendant used email addresses of [jessica.siegel@coloniallifesales.com](mailto:jessica.siegel@coloniallifesales.com) and [jessicahubley29@gmail.com](mailto:jessicahubley29@gmail.com). The Defendant presented commission forms to Colonial for the account(s) under the email address [jessica.siegel@coloniallifesales.com](mailto:jessica.siegel@coloniallifesales.com).

The Defendant conducted business from Yellowstone County, and her business address was in Billings, Montana. The Defendant's alleged criminal conduct occurred in Yellowstone County. The Defendant's alleged acts related to four businesses in Yellowstone County and one business in Gallatin County. The Defendant's alleged criminal acts crossed county lines and involved businesses in different Montana counties during the same time

frame. *See infra*. If an act requisite to the commission of an offense occurs or continues in more than one county, the charge may be filed in any county in which the act occurred or continued. *See generally* Mont. Code Ann. § 46-3-112.

The Defendant committed a series of acts or omissions resulting in a pecuniary loss to Colonial of at least \$1,500, or \$1,500 in value, motivated by a purpose to accomplish a single criminal objective or by a common purpose or plan that resulted in the repeated commission of the same offense or that affected the same person or the same persons or the property of the same person or persons.

## **OFFENSES**

### **Count 1 – Criminal Insurance Fraud (LP Anderson)**

LP Anderson is an automobile service and tire store business in Yellowstone County, Montana. The business is also known as Point S Tire and Auto Service. The Defendant presented insurance policy applications to Colonial for fictitious LP Anderson “employees.”

On or about June 24, 2019, the Defendant presented an account information form to Colonial for a LP Anderson group account. On the account information form, the Defendant indicated that Jessica Walker was the Human Resources (HR) person at LP Anderson. Jessica Walker is one of the Defendant’s aliases. The Defendant listed the authorizing officer’s email address as jessicawalkertires@gmail.com. The Defendant, as Jessica Walker, signed the form as LP Anderson’s authorizing officer.

On or about June 27, 2019, the Defendant submitted a commission set-up sheet to Colonial for policies for the LP Anderson account. The Defendant listed June 27, 2019, as the commission start date.

Between on or about August 23, 2019, and on or about May 29, 2020, the Defendant applied for insurance for at least nine fictitious LP Anderson's "employees" through the LP Anderson group account. The Defendant electronically signed each application. These applications presented by the Defendant to Colonial were for various insurance policies or products, including life insurance, critical illness insurance, and supplemental long-term care insurance for LP Anderson's "employees."

Each application was materially false or altered. For example, the applications included false names, employment dates, employment status, social security numbers, dates of birth, addresses, and contact information. The Defendant presented electronic insurance applications to Colonial with false PII for the fictitious "employees." In several instances, the Defendant applied for insurance coverage or benefits for the "employee's" spouses or children. The Defendant created Yellowstone County addresses in each of the applications for the "employees."

The Defendant presented or caused to be presented to Colonial approximately 22 materially false or altered applications of insurance for approximately nine "employees" under the LP Anderson group account. Based on the Defendant's conduct and series of acts, Colonial paid the Defendant approximately \$17,615.93 in commissions or other monies. Thus, Colonial sustained a pecuniary loss of at least \$1,500, or \$1,500 in value.

LIC Thomas contacted Dax Chandler at LP Anderson to verify the policy holders and group account information. Chandler was a LP Anderson representative. Thomas gave Chandler a list of the nine applicant "employee" names enrolled by the Defendant. Chandler stated that none of the applicant names are or were LP Anderson employees. Chandler stated that LP Anderson never signed, nor authorized any account information



form. Chandler confirmed that all applications submitted for the nine LP Anderson “employees” were fictitious. According to Chandler, the Defendant was never employed by LP Anderson.

## **Count 2 – Criminal Insurance Fraud (Sylvan Landscaping)**

Sylvan Landscaping (Sylvan) is a landscaping and nursery company in Yellowstone County, Montana. The Defendant presented insurance applications to Colonial for fictitious Sylvan Landscaping “employees.”

On or about January 7, 2019, the Defendant submitted an account information form to Colonial for insurance products or policies for a Sylvan group account. The Defendant signed the account information form. The Defendant listed Lindsay Kautz as the authorizing person for the Sylvan account and the owner of the business. The Defendant also listed a Billings, Montana address as the physical address of Sylvan.

The Defendant submitted a commission set-up sheet to Colonial for the Sylvan account. The enrollment start date on the commission sheet was January 9, 2019.

Between on or about August 9, 2019, and on or about September 27, 2019, the Defendant applied for insurance for approximately 16 fictitious Sylvan “employees,” and three fictitious “employee” spouses through the Sylvan group account. The Defendant electronically signed each application. These applications presented by the Defendant to Colonial were for various insurance policies or products, including life insurance, critical illness insurance, hospital confinement insurance, accident insurance, and supplemental long-term care insurance for Sylvan’s “employees” and their spouses.

Each application was materially false or altered. The applications included false names, employment dates, employment status, social security numbers, dates of birth, addresses, and contact information. The Defendant presented electronic applications to Colonial with false PII for the fictitious Sylvan “employees” and their spouses. In several instances, the Defendant also applied for insurance coverage for the “employee’s” child. The Defendant created Yellowstone County addresses in each of the applications for the “employees” and their spouses.

The Defendant presented or caused to be presented to Colonial at least 58 materially false or altered applications of insurance for approximately 16 “employees” and three “employee” spouses under the Sylvan group account. Based on the Defendant’s conduct and series of acts, Colonial paid the Defendant approximately \$32,027.05 in commissions or other monies. Thus, Colonial sustained a pecuniary loss of at least \$1,500, or \$1,500 in value.

LIC Thomas contacted Lindsay Kautz of Sylvan Landscaping. LIC Thomas provided Kautz with a list of 16 “employees” identified on the application(s). Kautz reviewed the list. Kautz stated that none of listed names were “employees” of Sylvan. Kautz also stated that she did not sign the account information form submitted by the Defendant to Colonial. A review of the account information form for Sylvan Landscaping contains a forged signature for Lindsay Kautz.

CSI Brunett also contacted Kautz. Kautz confirmed that she did not submit insurance applications to Colonial. Kautz also confirmed that she does not know any of the 16 names identified on the applications presented by the Defendant. Kautz never employed these 16 people. Kautz stated that she does not know the Defendant and never conducted business with the Defendant.



### **Count 3 – Criminal Insurance Fraud (McKee Inc.)**

Torri McKee owns a cleaning business named McKee Inc. McKee's business was located in Yellowstone County and Gallatin County, Montana. The Defendant presented insurance policy applications to Colonial for approximately 11 fictitious "employees" of McKee.

On or about November 27, 2018, a person by the name of Mary Forck submitted an account information form to Colonial for the McKee group account. The account's physical address as listed in the account information form is a Gallatin County address.

On or about May 30, 2019, the Defendant presented a commission set-up sheet to Colonial for policies for the McKee group account. The Defendant listed May 30, 2019, as the commission start date.

Between on or about May 30, 2019, and on or about December 20, 2019, the Defendant applied for insurance for at least 11 fictitious McKee "employees" through the McKee group account. The Defendant electronically signed each application. These applications presented by the Defendant to Colonial were for various insurance policies or products, including life insurance, critical illness insurance, hospital confinement insurance, and accident insurance for McKee "employees."

Each application was materially false or altered. The applications included false names, employment dates, employment status, social security numbers, dates of birth, addresses, and contact information. The Defendant presented electronic applications to Colonial with false PII for the fictitious McKee "employees." In several instances, the Defendant also applied for insurance coverage or benefits for the "employee's" spouse and/or child. The Defendant created Yellowstone County addresses in each of the applications for the "employees."

The Defendant presented or caused to be presented to Colonial at least 24 materially false or altered applications of insurance for at least 11 McKee “employees” under the McKee group account. Based on the Defendant’s conduct and series of acts, Colonial paid the Defendant at least \$20,004.33 in commissions or other monies. Thus, Colonial sustained a pecuniary loss of at least \$1,500, or \$1,500 in value.

LIC Thomas contacted McKee. LIC Thomas provided McKee with a list of 11 “employees” identified on the applications. McKee reviewed the list. McKee stated that none of the listed names were her employees. McKee also stated that she did not sign the account information form. A review of the account information form for the McKee account contains a forged signature for Torri McKee.

CSI Brunett also contacted McKee. McKee confirmed that she did not sign or submit life insurance applications to Colonial. Kautz also confirmed that she does not know any of the 11 names identified on the applications presented to Colonial by the Defendant. Kautz never employed these 11 people. Kautz stated that she never conducted business with Colonial. Kautz stated that any application with her signature on it would be a forgery.

#### **Count 4 – Criminal Insurance Fraud (Family Tree)**

Family Tree is a daycare business in Yellowstone County, Montana. The Defendant presented insurance policy applications to Colonial for fictitious Family Tree “employees.” Shelly Lehman is the owner of Family Tree.

On or about January 30, 2019, the Defendant submitted an account information form for insurance products or policies as a group plan through Family Tree. The Defendant listed Shelly Lehman as the authorizing officer

for the policies. The account information form contains a signature purported to be signed by Lehman.

On or about February 1, 2019, the Defendant applied for insurance for two Family Tree “employees” with Colonial as well as for Lehman. The Defendant electronically signed each application. The applications presented by the Defendant were for various Colonial insurance policies or products, including life insurance, critical illness insurance, and hospital confinement insurance.

Each application was materially false or altered. The Defendant presented electronic applications to Colonial with false PII for Lehman and the fictitious “employees.” In several instances, the Defendant applied for insurance coverage or benefits for an “employee” spouse and/or child. The Defendant created Yellowstone County addresses in the applications for the “employees” and Lehman.

The Defendant presented or caused to be presented to Colonial approximately nine materially false or altered applications of insurance for Lehman and Family Tree’s two “employees” under the Family Tree group account. Based on the Defendant’s conduct and series of acts, Colonial paid the Defendant approximately \$5,064.48 in commissions or other monies. Thus, Colonial sustained a pecuniary loss of at least \$1,500, or \$1,500 in value.

CSI Brunett spoke with Lehman. Lehman stated that the Defendant was one of her daycare parents, and the Defendant’s children went to Family Tree. CSI Brunett identified two “employees” which the Defendant claimed worked at Family Tree, according to the insurance applications the Defendant presented to Colonial. Lehman stated the two “employees” did not work at Family Tree, and Lehman does not know either of the two

“employees.” Lehman stated that she has never applied for any group life insurance policies.

CSI Brunett also spoke with Lehman about the insurance application the Defendant submitted on Lehman’s personal behalf. Lehman stated she did not sign any insurance application with the Defendant. CSI Brunett reviewed the PII the Defendant used on Lehman’s insurance application. Lehman stated that the application has an incorrect date of birth, social security number, and home mail address for her and an incorrect name listed for Lehman’s husband. According to Lehman, the Defendant never discussed life insurance policies with her. A review of the account information form for Family Tree contains a forged signature for Shelly Lehman.

#### **Count 5 – Criminal Insurance Fraud (Hays Dental)**

Hays Dental is a dentist office in Gallatin County, Montana. The Defendant presented insurance policy applications to Colonial for fictitious Hays Dental “employees.”

On or about January 29, 2020, the Defendant submitted an account information form to Colonial for insurance products or policies for a Hays Dental account. The Defendant signed the account information form. The Defendant listed Karena Askeland as the person who authorized the account. The Defendant identified a Bozeman, Montana address as the physical address for Hays Dental.

On or about January 30, 2020, the Defendant submitted a commission set-up sheet to Colonial for policies for the Hays Dental account. The Defendant listed January 31, 2020, as the commission start date.

Between on or about January 31, 2020, and on or about May 29, 2020, the Defendant applied for insurance for approximately 19 fictitious Hays

Dental “employees” through the Hays Dental group account. The Defendant electronically signed each application. These applications presented by the Defendant to Colonial were for various insurance policies or products, including life insurance, critical illness insurance, and hospital confinement insurance for Hays Dental “employees.”

Each application was materially false or altered. The applications included false names, employment dates, employment status, social security numbers, dates of birth, addresses, and contact information. The Defendant presented electronic applications to Colonial with false PII for the fake Hays Dental “employees.” In several instances, the Defendant also applied for insurance coverage or benefits for the “employee’s” spouse and/or child. The Defendant created Bozeman addresses in almost every application for the “employees.”

The Defendant presented or caused to be presented to Colonial approximately 51 materially false or altered applications of insurance for approximately 19 Hays Dental “employees” under the Hays Dental group account. Based on the Defendant’s conduct and series of acts, Colonial paid the Defendant approximately \$40,297.33 in commissions or other monies. Thus, Colonial sustained a pecuniary loss of at least \$1,500, or \$1,500 in value.

LIC Thomas contacted Hays Dental’s office manager, Karena Askeland. The account information form submitted by the Defendant contained a signature for Karena Askeland. Askeland stated that she did not sign the applications or authorize the Defendant to present any applications or account information forms for Hays Dental. Askeland reviewed the list of the Hays Dental policy applicants. Askeland stated that none of the names on the applications were Hays Dental employees. Askeland noted that some of

the first names matched, but not the last names. Askeland also indicated that Hays Dental did at one time considered applying for Colonial policies and had worked with the Defendant. A review of the account information form for Hays Dental contains a forged signature for Karena Askeland.

### CONCLUSION

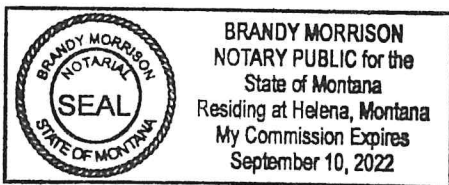
Based on these facts, the State respectfully requests that this Court find probable cause to charge the Defendant, Jessica Leigh Siegal, with the above felony offenses.

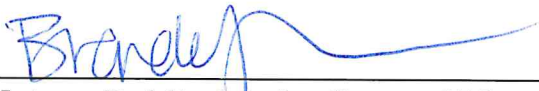
Dated the 29<sup>th</sup> day of November, 2021.

CHRIS MCCONNELL  
Special Deputy County Attorney  
for Yellowstone County  
Legal Counsel for the State

By:   
CHRIS MCCONNELL

SUBSCRIBED AND SWORN to before me this 29 day of November 2021, by Chris McConnell.



  
Notary Public for the State of Montana